

# EXHIBIT 02

Ammerson v. FMC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

|                                    |   |                              |
|------------------------------------|---|------------------------------|
| CINDY COSPER, Individually, as     | ) |                              |
| surviving child of Ronnie Ammerson | ) |                              |
|                                    | ) |                              |
| Plaintiff,                         | ) |                              |
|                                    | ) | CIVIL ACTION FILE            |
| v.                                 | ) |                              |
|                                    | ) | <b>NO. 2:08-CV-00189-RWS</b> |
| FORD MOTOR COMPANY                 | ) |                              |
|                                    | ) |                              |
|                                    | ) |                              |
| Defendant.                         | ) |                              |
| _____                              | ) |                              |

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**PLAINTIFF’S ATTORNEY DECLARATION**

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I, C. Tab Turner, submit this Declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an attorney with the law firm of Turner & Associates, P.A., counsel to Plaintiff in the referenced matter. I am familiar with the matters set forth in this Declaration, which I submit in support of the Responses to Motions for Summary Judgment.

2. Attached as **Exhibit 1** is a true and correct copy of the Traffic Accident Report published for the subject accident.

3. Attached as **Exhibit 2** is a true and correct copy of the deposition of Trooper Joey Wilson.

4. Attached as **Exhibit 3** is a true and correct copy of the report of Kelly Kennett.

5. Attached as **Exhibit 4** is a true and correct copy of the Vehicle Info Report.

6. Attached as **Exhibit 5** is a true and correct copy of the deposition of James Nix.

7. Attached as **Exhibit 6** is a true and correct copy of the deposition of Cindy Cosper.
8. Attached as **Exhibit 7** is a true and correct copy of the Affidavit of Mark Arndt.
9. Attached as **Exhibit 8** is a true and correct copy of the deposition of Mark Arndt.
10. Attached as **Exhibit 9** is a true and correct copy of the deposition of Don Tandy taken in Ammerson v. Ford.
11. Attached as **Exhibit 10** is a true and correct copy of the Ford Safety Policy Letter dated 1987.
12. Attached as **Exhibit 11** is a true and correct copy of the NHTSA Interpretation Letter dated 1979.
13. Attached as **Exhibit 12** is a true and correct copy of the Ford v. Ammerman decision.
14. Attached as **Exhibit 13** is a true and correct copy of the Buell-Wilson v. Ford Motor Co., decision.
15. Attached as **Exhibit 14** is a true and correct copy of Ford document EXP2 0236.
16. Attached as **Exhibit 15** is a true and correct copy of Ford document EXP2 213-21.
17. Attached as **Exhibit 16** is a true and correct copy of Ford document 8547 at 8548.
18. Attached as **Exhibit 17** is a true and correct copy of the deposition of Ford engineer [Explorer Program Manager] Roger Simpson dated 11/13/2000 at pages 156-157.
19. Attached as **Exhibit 18** is a true and correct copy of the deposition of Ford engineer Donald Tandy dated 3/3/2000 at page 23, lines 17-23.
20. Attached as **Exhibit 19** is a true and correct copy of Ford document EXPI619-24 dated 9/12/1989.
21. Attached as **Exhibit 20** is as true and correct copy of Ford document EXPN 1111 –

Observation Analysis.

22. Attached as **Exhibit 21** is a true and correct copy of Ford document RGRF 1192 (drawing).
23. Attached as **Exhibit 22** is a true and correct copy of Ford document EXPI 2175 (90 Rollover Guidelines).
24. Attached as **Exhibit 23** is a true and correct copy of the 1973 letter from Ford to Government.
25. Attached as **Exhibit 24** is a true and correct copy Ford document EXPE1 0000480 (P6-101).
26. Attached as **Exhibit 25** is a true and correct copy of the deposition of Jerry Sloan.
27. Attached as **Exhibit 26** is a true and correct copy of Ford document EXPU 8308-11 dated 10/27/1989.
28. Attached as **Exhibit 27** is a true and correct copy of Ford document 9863 dated 11/29/1989.
29. Attached as **Exhibit 28** is a true and correct copy of Roy v. Volkswagen of America, Inc. decision.
30. Attached as **Exhibit 29** is a true and correct copy of the deposition of Lee Carr; Brockie v. Ford; 5/15/1997; at pages 138:21 - 139:9.
31. Attached as **Exhibit 30** is a true and correct copy of Firestone document [12/89] at pages 2 - 3.
32. Attached as **Exhibit 31** is a true and correct copy of the deposition of Don Tandy dated 3/3/2000 at page 8-9.
33. Attached as **Exhibit 32** is a true and correct copy of Ford document EXPT 0288 [12/89].
34. Attached as **Exhibit 33** is a true and correct copy of Ford internal document EXPV 69 [2/1/90].

35. Attached as **Exhibit 34** is a true and correct copy of Firestone document BMD0023115.
36. Attached as **Exhibit 35** is a true and correct copy of Ford document FMC 183 [9/6/90].
37. Attached as **Exhibit 36** is a true and correct copy of the deposition of Ford engineer James Burdette [12-21-00] at pages 8:21-9:11.
38. Attached as **Exhibit 37** is a true and correct copy of Ford document FAAB 1440286 (Eichorn).
39. Attached as **Exhibit 38** is a true and correct copy of the deposition of Ford engineer Thomas Baughman at page 154, line 8.
40. Attached as **Exhibit 39** is a true and correct copy of the Expert Report of Mark Arndt.
41. Attached as **Exhibit 40** is a true and correct copy of the deposition of former NHTSA Administrator William Boehly; Cliburn v. Ford; [7/11/2001] at pages 14:19-15:13.
42. Attached as **Exhibit 41** is a true and correct copy of Ford document FAAB 1102819 (SDG).
43. Attached as **Exhibit 42** is a true and correct copy of the Expert Report of Steven Meyer.
44. Attached as **Exhibit 43** is a true and correct copy of the Expert Report of Sri Kumar.
45. Attached as **Exhibit 44** is a true and correct copy of the deposition of William Van Arsdell.
46. Attached as **Exhibit 45** is a true and correct copy of the Expert Report of Brian Herbst.
47. Attached as **Exhibit 46** is a true and correct copy of the deposition of Tim Chen.
48. Attached as **Exhibit 47** is a true and correct copy of the deposition of Ram Krishnaswami.
49. Attached as **Exhibit 48** is a true and correct copy of the deposition of Jan Ivarsson.
50. Attached as **Exhibit 49** is a true and correct copy of exhibit 13 to Ivarsson.
51. Attached as **Exhibit 50** is a true and correct copy of exhibit 14 to Ivarsson.
52. Attached as **Exhibit 51** is a true and correct copy of Ford document FAAE 0580245.
53. Attached as **Exhibit 52** is a true and correct copy of the Ford Deviation (1992).

54. Attached as **Exhibit 53** is a true and correct copy of the deposition of Fred Parrill.
55. Attached as **Exhibit 54** is a true and correct copy of the deposition of Fred Drotar.
56. Attached as **Exhibit 55** is a true and correct copy of the deposition of David Bickerstaff.
57. Attached as **Exhibit 56** is a true and correct copy of the deposition of Paul Hackert.
58. Attached as **Exhibit 57** is a true and correct copy of the deposition of Clarke Cunningham.
59. Attached as **Exhibit 58** is a true and correct copy of Ford document EXPX 0020604.
60. Attached as **Exhibit 59** is a true and correct copy of the deposition of Norman Lewicki.
61. Attached as **Exhibit 60** is a true and correct copy of Ford document EXPD 0508-509.
62. Attached as **Exhibit 61** is a true and correct copy of Ford document EXPO 0006-0012.

I declare under penalty of perjury that the foregoing statements made by me are true and correct.

Executed on May 19, 2022.

Respectfully Submitted,

/s/ C. Tab Turner  
C. Tab Turner